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19 MARK HUNT

20 **UNITED STATES DISTRICT COURT**
21 **DISTRICT OF NEVADA**

22 MARK HUNT, an individual,
23 Plaintiff,
24 v.

25 ZUFFA, LLC d/b/a ULTIMATE
26 FIGHTING CHAMPIONSHIP, a
27 Nevada limited liability company;
28 BROCK LESNAR, an individual;
DANA WHITE, an individual; and
DOES 1-50, inclusive,
Defendants.

Case No.: 2:17-cv-00085-JAD-CWH

**STIPULATION AND [PROPOSED]
ORDER RE: EXTENSION OF TIME
TO FILE STIPULATED DISCOVERY
PLAN AND PROPOSED
SCHEDULING ORDER**

[FIRST REQUEST FOR EXTENSION]

Pursuant to this Court's order and consistent with the Federal Rules of Civil
Procedure, rule 26 and Local Rule 26-1, the parties' stipulated discovery plan and

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1 proposed scheduling order is to be filed by December 26, 2017. Plaintiff MARK HUNT
2 (“Hunt”), and Defendants ZUFFA, LLC d/b/a ULTIMATE FIGHTING
3 CHAMPIONSHIP (“Zuffa”), DANA WHITE (“White”) and BROCK LESNAR
4 (“Lesnar”) hereby stipulate to extend the deadline for parties to file the stipulated
5 discovery plan and proposed scheduling order for ten (10) days, until January 5, 2018.
6 This stipulation is based on the following:

7 Defendants Lesnar, Zuffa, and White have pending motions to dismiss before the
8 Court. Hunt filed a motion for leave to file a supplemental complaint on December 15,
9 2017. (ECF No. 100.) Counsel for all parties have conferred via e-mail regarding the
10 stipulated discovery plan and proposed scheduling order. This action will involve a high
11 volume of documents and electronic information. Counsel for Zuffa has advised it will
12 seek a stipulated protective order; Hunt and Lesnar will negotiate in good faith to reach
13 mutually agreeable stipulated protective order. The Court’s order on Lesnar’s motion to
14 stay discovery, consistent with Hunt’s agreement to stay RICO-related discovery, ordered
15 that discovery will be stayed as to Hunt’s first and second claims, but shall otherwise
16 proceed on all other claims.

17 Counsel for all parties intend to meet telephonically to discuss a discovery plan,
18 scheduling, and case-specific issues regarding a stipulated protective order and
19 consideration of crafting a discovery plan subject to the partial discovery stay. The parties
20 request a brief extension to permit lead counsel for all parties to participate in the
21 telephonic conference of counsel, and submit this will facilitate reaching potential
22 discovery agreements and stipulations consistent with F.R.C.P. 26 and LR 26-1. The
23 parties have been unable to coordinate a mutually convenient time for lead counsel to
24 participate in the telephonic conference prior to the Christmas holiday due to calendaring
25 conflicts with other matters and pre-existing travel obligations. The stipulated discovery
26 plan and proposed scheduling order is currently due on December 26, 2017. This is the
27 first request for an extension of time.
28

1 Based on the foregoing, good cause exists and the parties hereby stipulate and
2 request that the Court issue an Order extending the deadline to file the stipulated
3 discovery plan and proposed scheduling order ten (10) days to January 5, 2018.

4
5 DATED: December 21, 2017

HIGGS FLETCHER & MACK LLP

6 By: /s/ Joseph A. Gonnella

7 CHRISTINA M. DENNING, ESQ.

8 SCOTT J. INGOLD, ESQ.

9 JOSEPH A. GONNELLA, ESQ.

Attorneys for Plaintiff

MARK HUNT

10 DATED: December 21, 2017

CAMPBELL & WILLIAMS

11 By: /s/ Philip R. Erwin

12 J. COLBY WILLIAMS, ESQ.

13 PHILIP R. ERWIN, ESQ.

Attorneys for Defendants ZUFFA, LLC

14 d/b/a ULTIMATE FIGHTING

15 CHAMPIONSHIP and DANA WHITE

16 DATED: December 21, 2017

CHRISTIANSEN LAW OFFICES

17 By: /s/ Howard Jacobs

18 HOWARD JACOBS, ESQ.

Attorneys for Defendants BROCK

19 LESNAR

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21 IT IS SO ORDERED:

22
23 BY: 
24 UNITED STATES MAGISTRATE JUDGE

25 December 22, 2017

26 DATED: _____

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